

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Case No. 21-10419-mg

Louasia A. Watts,

Chapter 7

Debtor.
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DECLARATION

I, LOUASIA WATTS, declare under penalty of perjury as follows:

1. I am the debtor in the above-captioned matter.
2. I previously worked at Pret A Manger (USA) Limited at several locations for different periods between approximately May 2016 and approximately March 2020.
3. While working at Pret I was subjected to misconduct based on my race and gender, as detailed in complaint in the pending employment discrimination action entitled *Louasia Watts v. Pret A Manger (USA) Limited, Cristian Perez, and Katherine Lopez*, Index No. 802764/2023E. A copy of the complaint in that matter is attached as **Exhibit A**.
4. While I knew the behavior described in the complaint was wrong and found it very upsetting, I did not know at that time that it gave me the right to pursue a legal claim, let alone how long such a claim would be valid.
5. On March 4, 2021, I filed a voluntary petition for bankruptcy (the “Petition”), along with schedules of assets and liabilities (the “Schedules”) and statement of financial affairs (the “Statement”) under Chapter 7 of the Bankruptcy Code in this Court. A copy of the Petition, Schedules, and Statement is attached as **Exhibit B**.

6. I hired a local attorney to help me with the filing. We spoke very briefly over the phone. He did not ask me about any of my experiences at work or mention that things that happened to me at work could give me a legal claim.

7. Based on our conversation, my attorney checked a box in the Schedules stating that I did not have any claims against third parties. As I explained above, at the time I did not know that what had happened to me at Pret gave me a claim against Pret or anyone else.

8. On June 11, 2021, this Court granted me a discharge. A copy of that discharge is attached as **Exhibit C**.

9. In or around late 2022, I learned that the law firm of Arenson, Dittmar & Karban had sued companies for discrimination based on behavior very similar to what had happened to me.

10. I contacted the firm and told them about my experiences at Pret.

11. After meeting and consulting with attorneys at the firm, I learned that my experiences at Pret gave me a legal claim against Pret and some Pret employees.

12. I decided to file a lawsuit against Pret for discrimination. I did not realize that my bankruptcy affected my right to do that, so I did not tell my attorneys at Arenson, Dittmar & Karban that I had filed for bankruptcy before filing the lawsuit against Pret.

13. My attorneys have told me that on May 19, 2023, Defendants filed a motion to dismiss the lawsuit against Pret because I did not list my claims against Pret on the Schedules.

14. Now that I understand that I have claims against Pret and that those claims should be part of my bankruptcy estate, I am asking the court to reopen my bankruptcy so that I can add the claims to the Schedules.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Bronx, New York

June 22^L, 2023

Louasia Watts
Louasia Watts (Jun 22, 2023 14:22 EDT)
Louasia Watts